



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

900 North Skyline, Suite B • Idaho Falls, Idaho 83402-1718 • (208) 528-2650

Dirk Kempthorne, Governor  
C. Stephen Allred, Director

October 17, 2001

CERTIFIED MAIL # 70000520002348766561

Mr. Mike G. Rukavina, Owner  
Challis Redi-Mix  
P.O. Box 401  
Challis, ID 83226

RE: T2-010544, Concrete Batch Plant, Challis  
(Tier II Operating Permit Modification No. 037-00008)

Dear Mr. Rukavina :

The Idaho Department of Environmental Quality (DEQ) is issuing a draft Tier II Operating Permit No. 037-00008 for Challis Redi-Mix in accordance with IDAPA 58.01.01.400 (*Rules for the Control of Air Pollution in Idaho*) (*Rules*) for your review. A final permit will be issued by the administration after a scheduled permit handoff meeting.

The enclosed operating permit is based on the information contained in your permit application, received May 23, 2001, with additional information received June 21, 2001. Modification to and/or renewal of this operating permit shall be requested in a timely manner in accordance with the *Rules*.

You, as well as any other entity, may have the right to appeal this final agency action pursuant to the Idaho Department of Health and Welfare Rules, Title 5, Chapter 3, *Rules Governing Contested Case Proceedings and Declaratory Rulings*, by filing a petition with the Hearings Coordinator, Department of Environmental Quality, 1410 N. Hilton, Boise, ID 38706-1255, within 35 days of the date of this decision. However, DEQ encourages you to contact the Air Quality Permit Program to address any concerns you may have with the enclosed permit prior to filing a petition for a contested case.

If you have any questions regarding the terms or conditions of the enclosed permit, please contact Mr. Jorge Garcia, of the Idaho Falls Regional Office, at (208) 528-2650.

Sincerely,

James Johnston  
Regional Administrator  
Idaho Falls Regional Office

Enclosures

cc: State Office, Marilyn Seymore DB  
Idaho Falls Regional Office  
L. Kral, EPA - Region 10



**Air Pollution**

**TIER II OPERATING PERMIT**

State of Idaho  
Department of Environmental Quality

PERMIT NO.: 037-00008

AQCR: 63

CLASS: B

SIC: 3273

ZONE: 11

UTM COORDINATE (km): 722.4 , 4931.3

1. PERMITTEE  
Challis Redi-Mix

2. PROJECT  
Concrete Batch Plant

3. MAILING ADDRESS  
P.O. Box 401

CITY  
Challis

STATE  
Idaho

ZIP  
83226

4. FACILITY CONTACT  
Mike G. Rukavina

TITLE  
Owner

TELEPHONE  
(208) 879-4381

5. RESPONSIBLE OFFICIAL  
Mike G. Rukavina

TITLE  
Owner

TELEPHONE  
(208) 879-4381

6. EXACT PLANT LOCATION  
Southeast corner of intersection of Valley Road and Robins Lane

COUNTY  
Custer

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS  
Concrete and Aggregate Sales

8. PERMIT AUTHORITY

This permit is issued according to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.400, and pertains only to emissions of air contaminants that are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (Department) technical analysis of the supplied information. Changes in design or equipment, which result in any change in the nature or amount of emissions, may be a modification. Modifications are subject to Department review in accordance with Section 58.01.01.200 of the *Rules for the Control of Air Pollution in Idaho*.

ADMINISTRATOR, IDAHO FALLS OFFICE  
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE ISSUED: October 17, 2001

October 17, 2006

DATE EXPIRES:

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 037-00008**

PERMITTEE: CHALLIS REDI-MIX  
LOCATION: CHALLIS

DATE ISSUED: 07-17-2001  
DATE EXPIRES: 07-17-2001

**Concrete Batch Plant and Gravel Pit**

**.0 EMISSION LIMITS**

- .1 Emissions emanating from any stack, vent, or other functionally equivalent opening shall not exceed twenty percent opacity for a period or periods aggregating more than three minutes in any 60-minute period as required in IDAPA 58.01.01.625 (*Rules for the Control of Air Pollution in Idaho*). Opacity shall be determined using the procedures contained in IDAPA 58.01.01.625.
- .2 Fugitive emissions shall not be observed leaving the property boundary for a period or periods aggregating more than three minutes in any 60-minute period. Visible emissions shall be determined by Method 22, as described in 40 CFR Part 60, Appendix A, or a Department-approved alternative method.

**2.0 OPERATING REQUIREMENTS**

- 2.1 The total cement transferred to the storage silo shall not exceed 84,000 pounds per day.
- 2.2 Generator operation shall not exceed 4,500 hours in any consecutive 12-month period.
- 2.3 As required in IDAPA 58.01.01.651, all reasonable precautions shall be taken to prevent particulate matter from becoming airborne. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following, where practical:
- 2.3.1 Using water or chemicals to control dust in the demolition of existing buildings or structures, construction operations, road grading, or the clearing of land;
- 2.3.2 Applying asphalt, water, or suitable chemicals to, or covering, dirt roads, material stockpiles, and other surfaces that can create dust;
- 2.3.3 Installing and using hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations;
- 2.3.4 Covering open-bodied trucks transporting materials likely to give rise to airborne dusts;
- 2.3.5 Paving roadways and maintaining them in a clean condition, where practical; or
- 2.3.6 Promptly removing earth or other stored material from streets.
- 2.4 Within 180 days after the issuance of this permit, the permittee shall have installed a fabric filter and developed an operations and maintenance (O&M) manual for the fabric filter which describes the procedures that shall be followed to comply with General Provision B and the fabric filter requirements contained in this permit. The manual shall remain onsite at all times and shall be made available to Department representatives upon request.
- 2.5 The permittee shall install, calibrate, maintain and operate the fabric filter in accordance with manufacturer's specifications.

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**Concrete Batch Plant and Gravel Pit**

**3.0 MONITORING AND RECORDKEEPING REQUIREMENTS**

- 3.1 The permittee shall monitor and record, during operation, the periodic method(s) used to reasonably control fugitive emissions from this facility. The record shall include the type of control used (e.g., water, environmentally safe chemical dust suppressants, etc.) as well as the circumstances under which no controls are used. The most recent two years' compilation of data shall be kept onsite and shall be made available to Department representatives upon request.
- 3.2 The number of pounds of cement transferred to the cement storage silo per day shall be recorded. The most recent two years' compilation of data shall be kept onsite and shall be made available to Department representatives upon request.
- 3.3 The number of hours of generator operation per month shall be recorded for each generator. The most recent two years' compilation of data shall be kept onsite and shall be made available to Department representatives upon request.

**4.0 REPORTING REQUIREMENTS**

- 4.1 All documents, including, but not limited to, application forms for permits to construct, monitoring data, supporting information, requests for confidential treatment, testing reports, and compliance certifications submitted to the Department shall contain a certification by a responsible official in accordance with IDAPA 58.01.01.123. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

**5.0 EMISSION LIMITS**

Silo, PM <sub>10</sub>	11.76 lb/dy
Generators, NO <sub>x</sub>	12.85 tpy

Compliance with Permit Conditions 2.1 and 2.2 shall be sufficient to demonstrate compliance with this section.

lb/dy – pounds per day

tpy – tons per year

PM<sub>10</sub> – particulate matter less than ten micrometers in diameter

NO<sub>x</sub> – oxides of nitrogen

**AIR QUALITY TIER II OPERATING PERMIT NUMBER: 037-00008**

PERMITTEE: CHALLIS REDI-MIX  
LOCATION: CHALLIS

DATE ISSUED: 10-17-2001  
DATE EXPIRES: 10-17-2006

**General Provisions**

**TIER II OPERATING PERMIT GENERAL PROVISIONS**

- A. All emissions authorized herein shall be consistent with the terms and conditions of this permit. The emission of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code 39-101 et. seq.
3. The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain and operate in good working order all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable laws for the control of air pollution.
- C. The permittee shall allow the Director, and/or his authorized representative(s), upon the presentation of credentials:
  - 1) To enter upon the permittee's premises where an emission source is located, or in which any records are required to be kept under the terms and conditions of this permit; and
  - 2) At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and to require stack emission testing (i.e., performance tests) in conformance with state-approved or accepted U.S. Environmental Protection Agency procedures when deemed appropriate by the Director.
- D. Except for data determined to be confidential under Section 9-342A, *Idaho Code*, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the appropriate regional office of the Department.
- E. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
- F. In the event of any change in control or ownership of source(s) from which the authorized emissions emanate, the permittee shall notify the succeeding owner or controller of the existence of this permit by letter, a copy of which shall be forwarded to the Director.
- G. This permit shall be renewable on the expiration date, provided the permittee submits any and all information necessary for the Director to determine the amount and type of air pollutants emitted from the equipment for which this permit is granted. Failure to submit such information within 60 days after receipt of the Director's request shall cause the permit to be voided.
- H. The Director may require the permittee to develop a list of operation and maintenance procedures to be approved by the Department. Such list of procedures shall become a part of this permit by reference, and the permittee shall adhere to all of the operation and maintenance procedures contained therein.
- I. Performance tests (i.e., air emission source tests) conducted pursuant to testing requirements in this permit must be conducted in accordance with IDAPA 58.01.01.157. Such testing shall not be conducted on weekends or state holidays unless the permittee obtains prior Department approval.

The permittee shall submit a proposed test date for each performance test required by this permit to the Department for approval at least 15 days prior to each respective test date (including each test date for periodic tests such as, for example, annual tests). The permittee shall promptly notify the Department of any change in the proposed test date and shall provide at least five working days advanced notice prior to conducting any rescheduled test, unless the Department approves a shorter notice period.

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**General Provisions**

Within 30 days of the date on which a performance test required by this permit is concluded, the permittee shall submit to the Department a performance test report for the respective test. The performance test report shall include any and all process operating data required to be recorded during the test period as well as the test results, raw test data, and associated documentation.

The maximum allowable source operating rate shall be limited to 120 percent of the average operating rate attained during the most recent performance test conducted pursuant to this permit, for which a test protocol has been granted prior approval by the Department, which demonstrated compliance with the respective pollutant emission limit unless (1) a more restrictive operating limit is specified elsewhere in this permit or, (2) at such an operating rate, emissions would exceed any emission limit(s) set forth in this permit.

- J. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.